Message

**From**: Wente, Stephen [Wente.Stephen@epa.gov]
**Sent**: 1/6/2021 9:37:49 PM
**To**: Wagman, Michael [Wagman.Michael@epa.gov]; Blankinship, Amy [Blankinship.Amy@epa.gov]; Garber, Kristina [Garber.Kristina@epa.gov]; Federoff, Nicholas [Federoff.Nicholas@epa.gov]
**CC**: Milians, Karen [Milians.Karen@epa.gov]
**Subject**: RE: FYI: bee risk assessment approach for aldicarb

I put a shorter version of this in the SharePoint document as well:

$$Koc = (Kd * 100) / \% \text{ Organic carbon}$$

The Koc being approximately 10 times the Kd comes from the Tier 1 rice guidance which assumes that a rice paddy sediment is about 10% organic carbon. This is a higher organic carbon than in most soils, but it sounds like you are looking for something that works with plants, so I don't know if this makes sense for your application?

USEPA. 2007. *Tier I Rice Model - Version 1.0 - Guidance for Estimating Pesticide Concentrations in Rice Paddies*. May 8, 2007. Environmental Fate and Effects Division. Office of Pesticide Programs. U.S. Environmental Protection Agency. Available at https://www.epa.gov/pesticide-science-and-assessing-pesticide-risks/tier-i-rice-model-version-10-guidance-estimating (Accessed April 25, 2016).

**From:** Wagman, Michael <Wagman.Michael@epa.gov>
**Sent:** Wednesday, January 6, 2021 3:02 PM
**To:** Blankinship, Amy <Blankinship.Amy@epa.gov>; Garber, Kristina <Garber.Kristina@epa.gov>; Federoff, Nicholas <Federoff.Nicholas@epa.gov>
**Cc:** Wente, Stephen <Wente.Stephen@epa.gov>; Milians, Karen <Milians.Karen@epa.gov>
**Subject:** RE: FYI: bee risk assessment approach for aldicarb

Internal and Deliberative

Attached is a streamlined bee risk assessment ready for your review. Thanks so much Kris for helping us work through this! Steve-I also have a question for you on the Koc extrapolation.

Thanks!!

Michael

**From:** Blankinship, Amy <Blankinship.Amy@epa.gov>
**Sent:** Wednesday, January 06, 2021 2:17 PM
**To:** Garber, Kristina <Garber.Kristina@epa.gov>
**Cc:** Wagman, Michael <Wagman.Michael@epa.gov>
**Subject:** RE: FYI: bee risk assessment approach for aldicarb

Thanks Kris.

**From:** Garber, Kristina <Garber.Kristina@epa.gov>
**Sent:** Wednesday, January 06, 2021 2:13 PM
**To:** Steeger, Thomas <Steeger.Thomas@epa.gov>; Sappington, Keith <Sappington.Keith@epa.gov>
**Cc:** Wagman, Michael <Wagman.Michael@epa.gov>; Blankinship, Amy <Blankinship.Amy@epa.gov>
**Subject:** FYI: bee risk assessment approach for aldicarb

Hi Tom and Keith,

ERB2 is currently working on a bee risk assessment for a NU on aldicarb (applications to FL citrus to control Asian citrus psyllid). At the last minute (the assessment needs to be signed tomorrow), they were asked to do a bee risk assessment even though the Tier I data set is incomplete. I met with Amy and Michael and we determined the following path forward:

> To bridge the gaps for aldicarb, Michael will utilize Tier I toxicity data that are available for other structurally similar carbamate insecticides (i.e., oxamyl and methomyl). There is no chronic larval toxicity study available; however, since these chemicals are fast acting, the acute NOAEL will be used in place of a chronic NOAEL. BeeREX will be used to generate Tier I RQs for aldicarb. As a condition of registration, RD plans to call in confirmatory data for Aldicarb, including the full suite of bee data.

I wanted to make you aware of this approach. Please let me know if you have any questions or concerns.

Thanks,
Kris

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